

Paul P. Eyre
Ernest E. Vargo
Michael E. Mumford
BAKER HOSTETLER LLP
PNC Center
1900 East Ninth Street, Suite 3200
Cleveland, OH 44114-3482
Telephone: (216) 621-0200
Facsimile: (216) 696-0740
Email: peyre@bakerlaw.com
evargo@bakerlaw.com
mmumford@bakerlaw.com

Tracy L. Cole
BAKER HOSTETLER LLP
45 Rockefeller Plaza
11th Floor
New York, NY 10111
Telephone: (212) 589-4228
Facsimile: (212) 589-4201
Email: tcole@bakerlaw.com

Attorneys for Defendant
Mitsui & Co. (Taiwan), Ltd.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

17	IN RE: TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION	Master File No. 3:07-md-1827 SI
18	This Document Relates to Individual Case No. C 11-0829 SI	MDL No. 1827
19		
20	METROPCS WIRELESS, INC., Plaintiff, v. AU OPTRONICS CORPORATION, et al., Defendants.	Individual Case No. C 11-0829 SI STIPULATION OF EXTENSION OF TIME TO RESPOND TO COMPLAINT, WAIVER OF SERVICE, AND [PROPOSED] ORDER Clerk's Action Required
21		
22		
23		
24		

WHEREAS, plaintiff MetroPCS Wireless, Inc. (“MetroPCS”) filed a complaint in the above-captioned case against AU Optronics Corporation, AU Optronics Corporation America, Chi Mei Optoelectronics Corporation, Chi Mei Optoelectronics USA, Inc., CMO Japan Co., Ltd., Epson Electronics America, Inc., Epson Imaging Devices Corporation, Hannstar Display

1 Corporation, Hitachi Electronic Devices (USA), Inc., Hitachi, Ltd., Hitachi Displays, Ltd., Mitsui
2 & Co. (Taiwan), Ltd., Sanyo Consumer Electronics Co., Ltd., Sharp Corporation, Sharp
3 Electronics Corporation, Tatung Company of America, Inc., Toshiba America Electronic
4 Components, Inc., Toshiba America Information Systems, Inc., Toshiba Corporation, and
5 Toshiba Mobile Display Co., Ltd. (collectively, "Stipulating Defendants"), among other
6 defendants, on December 17, 2010 ("Complaint");

7 WHEREAS, MetroPCS wishes to avoid the burden and expense of serving process on the
8 Stipulating Defendants;

9 WHEREAS, the Stipulating Defendants desire a reasonable amount of time to respond to
10 the Complaint; and

11 WHEREAS, MetroPCS and the Stipulating Defendants believe that proceeding on a
12 unified response date will create efficiency for the Court and the parties.

13 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
14 undersigned counsel, on behalf of their respective clients, MetroPCS, on the one hand, and the
15 Stipulating Defendants, on the other hand, as follows:

16 1. The Stipulating Defendants waive service of the Complaint under Federal Rule of
17 Civil Procedure 4(d). This stipulation does not constitute a waiver by the Stipulating Defendants
18 of any other substantive or procedural defense, including but not limited to the defenses of lack of
19 personal or subject matter jurisdiction and improper venue.

20 2. The Stipulating Defendants' deadline to move to dismiss, answer, or otherwise
21 respond to the Complaint will be ninety (90) days from the execution of this stipulation. In
22 computing this time period, Rule 6 of the Federal Rules of Civil Procedure shall govern.

23

24

25

26

27

28

1 DATED: February 25, 2011
2

3 By: /s/ Christopher A. Nedeau
4 Christopher A. Nedeau (CA Bar No. 81297)
Carl L. Blumenstein (CA Bar No. 124158)
Katharine Chao (CA Bar No. 247571)
NOSSAMAN LLP
5 50 California Street, 34th Floor
San Francisco, California 94111-4799
(415) 398-3600 (Phone)
(415) 398-2438 (Facsimile)
cnedea@nossaman.com
cblumenstein@nossaman.com
kchao@nossaman.com

6
7
8
9 *Counsel for Defendants AU Optronics Corporation and AU Optronics Corporation America*
10

11 By: /s/ Adam Raviv
12 Nathan L. Walker (CA Bar No. 206128)
WILMER CUTLER PICKERING HALE AND DORR LLP
13 950 Page Mill Road
Palo Alto, California 94304
(650) 858-6000 (Phone)
(650) 858-6100 (Facsimile)
Nathan.Walker@wilmerhale.com

14
15 Steven Cherry (*pro hac vice*)
Adam Raviv (*pro hac vice*)
WILMER CUTLER PICKERING HALE AND DOOR LLP
16 1875 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 663-6000 (Phone)
(202) 663-6363 (Facsimile)
Steven.Cherry@wilmerhale.com
Adam.Raviv@wilmerhale.com

17
18
19
20 *Counsel for Chi Mei Optoelectronics Corporation, Chi Mei Optoelectronics USA, Inc.,*
CMO Japan Co., Ltd.
21

22
23
24
25
26
27
28

1 By: /s/ Stephen P. Freccero
2 Melvin R. Goldman (CA Bar No. 34097)
3 Stephen P. Freccero (CA Bar No. 131093)
4 Derek F. Foran (CA Bar No. 224569)
5 MORRISON & FOERSTER LLP
6 425 Market Street
7 San Francisco, CA 94105-2482
(415) 268-7000 (Phone)
(415) 268-7522 (Facsimile)
mgoldman@mofo.com
sfreccero@mofo.com
dforan@mofo.com

8 *Counsel for Defendants Epson Electronics America, Inc. and Epson Imaging Devices Corporation*

9
10 By: /s/ Ramona M. Emerson
11 Hugh F. Bangasser (*pro hac vice*)
12 Ramona M. Emerson (*pro hac vice*)
13 Christopher M. Wyant (*pro hac vice*)
14 Jeffrey L. Bornstein (CA Bar No. 99358)
15 K&L GATES LLP
16 925 Fourth Avenue, Suite 2900
Seattle, WA 98104
(206) 623-7580 (Phone)
(206) 370-6371 (Facsimile)
romana.emerson@klgates.com

17 *Counsel for Defendant Hannstar Display Corporation*

18 By: /s/ Kent M. Roger
19 Kent M. Roger (CA Bar No. 95987)
20 Michelle Kim-Szrom (CA Bar No. 252901)
21 Jennifer L. Calvert (CA Bar No. 258018)
22 MORGAN LEWIS & BOCKIUS LLP
23 One Market, Spear Street Tower
San Francisco, CA 94105-1126
(415) 442-1000 (Phone)
(415) 442-1001 (Facsimile)
kroger@morganlewis.com
mkim-szrom@morganlewis.com
jennifer.calvert@morganlewis.com

24
25 *Counsel for Defendants Hitachi, Ltd., Hitachi Displays, Ltd. and Hitachi Electronic Devices (USA), Inc.*

BAKER & HOSTETLER LLP
ATTORNEYS AT LAW
CLEVELAND

1 By: /s/ Michael E. Mumford
2 Paul P. Eyre
3 Ernest E. Vargo
4 Michael E. Mumford
5 BAKER & HOSTETLER LLP
6 PNC Center
7 1900 East Ninth Street, Suite 3200
Cleveland, Ohio 44114-3482
(216) 621-0200 (Phone)
(216) 696-0740 (Facsimile)
peyre@bakerlaw.com
evargo@bakerlaw.com
mmumford@bakerlaw.com

8 *Counsel for Defendant Mitsui & Co. (Taiwan), Ltd.*

9
10 By: /s/ Allison A. Davis
11 Allison A. Davis (CA Bar No. 139203)
DAVIS WRIGHT TREMAINE LLP
12 505 Montgomery Street, Suite 800
San Francisco, CA 94111-6533
(415) 276-6500 (Phone)
(415) 276-6599 (Facsimile)
allison.davis@dwt.com

14 *Counsel for Defendant Sanyo Consumer Electronics Co., Ltd.*

15
16 By: /s/ Jacob R. Sorenson
17 John M. Grenfell (CA Bar No. 88500)
Jacob R. Sorensen (CA Bar No. 209134)
Fusae Nara (*pro hac vice*)
18 PILLSBURY WINTHROP SHAW PITTMAN LLP
50 Fremont Street
19 San Francisco, CA 94105
(415) 983-1000 (Phone)
(415) 983-1200 (Facsimile)
john.grenfell@pillsburylaw.com
jake.sorensen@pillsburylaw.com
fusae.nara@pillsburylaw.com

22 *Counsel for Defendants Sharp Corporation and Sharp Electronics Corporation*

BAKER & HOSTETLER LLP
ATTORNEYS AT LAW
CLEVELAND

1 By: /s/ Rachel S. Brass
2 Rachel S. Brass
3 GIBSON, DUNN & CRUTCHER LLP
4 555 Mission Street, Suite 3000
5 San Francisco, CA 94105-2933
6 (415) 393-8200 (Phone)
7 (415) 393-8306 (Facsimile)
8 *rbrass@gibsondunn.com*

9
10
11 *Counsel for Defendant Tatung Company of America, Inc.*

12 By: /s/ John H. Chung
13 John H. Chung
14 WHITE & CASE LLP
15 1155 Avenue of the Americas
16 New York, NY 10036-2787
17 (212) 819-8200 (Phone)
18 (212) 354-8113 (Facsimile)
19 *jchung@whitecase.com*

20
21 *Counsel for Defendants Toshiba Corporation, Toshiba America Electronic Components, Inc.,
22 Toshiba America Information Systems, Inc., and Toshiba Mobile Display Co., Ltd.*

23 By: /s/ Philip J. Iovieno
24 William A. Isaacson
25 BOIES, SCHILLER & FLEXNER LLP
26 5301 Wisconsin Avenue, N.W., Suite 800
27 Washington, D.C. 20015
28 (202) 237-2727 (Phone)
29 (202) 237-6131 (Facsimile)
30 *wisaacson@bsflp.com*

31 Philip J. Iovieno
32 Anne M. Nardacci
33 BOIES, SCHILLER & FLEXNER LLP
34 10 North Pearl Street, 4th Floor
35 Albany, NY 12207
36 (518) 434-0600 (Phone)
37 (518) 434-0665 (Facsimile)
38 *piovieno@bsflp.com*
39 *anardacci@bsflp.com*

40
41 *Counsel for Plaintiff MetroPCS Wireless, Inc.*

1 [PROPOSED] ORDER
2
3

IT IS SO STIPULATED.

DATED this 28th day of February, 2011.

4
5 By: _____
6 Hon. SUSAN ILLSTON

